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11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 SARAH C., pseudonymously,

14 Plaintiff,

15 vs.

16 HILTON FRANCHISE HOLDING LLC, et al.,

Defendants.

Case No.: 2:23-cv-2037-APG-DJA

Judge Andrew P. Gordon

**STIPULATION AND ORDER TO
STAY DISCOVERY**

17 Plaintiff Sarah C. and Defendants SSJV Hospitality LLC, Hilton Franchise Holding LLC,
18 and FP Holdings, L.P. (collectively the “Parties”), by and through their respective counsel of
19 record, hereby agree and stipulate as follows:

20 On March 14 and 15, 2024, Defendants Hilton Franchise Holding LLC and FP Holdings,
21 L.P. filed their respective motions to dismiss Plaintiff’s first amended complaint. (ECF Nos. 40
22 & 43) (the “Motions to Dismiss”). Defendant SSJV Hospitality LLC filed a joinder to Defendant
23 Hilton Franchise Holding LLC’s Motion to Dismiss on March 14, 2024. (ECF No. 41).

24 On April 5 and April 12, 2024, Plaintiff filed her responses in opposition to Defendants’
25 pending Motions to Dismiss. (ECF Nos. 45 & 49).

26 Replies in Support of the Motions to Dismiss were filed by Defendants Hilton Franchise
27 Holding LLC and FP Holdings, L.P. on April 4 and 12, 2024, respectively. (ECF Nos. 47 & 50).
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Defendant SSJV Hospitality LLC filed a joinder to Defendant Hilton Franchise Holding LLC's Reply in Support of Motion to Dismiss on April 4, 2024. (ECF No. 48).

In the interests of judicial economy and to avoid the incurrence of unnecessary attorneys' fees and costs, the Parties agree that discovery should be stayed pending the Court's ruling on the aforementioned Motions to Dismiss. Good cause exists for a stay of discovery here because discovery in this case involves the production of records involving a Plaintiff who alleges she is a survivor of human trafficking. Discovery will necessarily involve highly sensitive documents related to Plaintiff; a stay while Defendants' Motions to Dismiss are pending will maximize the protections of Plaintiff's privacy, conserve judicial resources, and avoid unnecessary costs.

To the extent that the Court's decision on the Motions to Dismiss does not fully dispose of this matter, the Parties agree that a discovery plan and proposed scheduling order shall be due within thirty (30) days of the Court's decision on the Motions to Dismiss.

The Parties further discussed and intend to propose a one (1) year discovery period commencing as of the date of the Court's ruling on the Motions to Dismiss.

IT IS SO STIPULATED.

Dated: May 6, 2024

<p>JONES DAY</p> <p>By: <u>/s/ Nicole M. Perry</u> Nicole M. Perry, Esq. (<i>Pro Hac Vice</i>) 717 Texas Avenue, Suite 3300 Houston, TX 77002</p> <p>Bethany K. Biesenthal, Esq. (<i>Pro Hac Vice</i>) Allison L. McQueen, Esq. (<i>Pro Hac Vice</i>) 110 North Wacker Drive, Suite 4800 Chicago, IL 60606</p> <p>NAYLOR & BRASTER Jennifer L. Braster Nevada Bar No. 9982 10100 W. Charleston Blvd., Suite 120 Las Vegas, NV 89135</p>	<p>HILTON PARKER LLC</p> <p>By: <u>/s/ Geoffrey Parker</u> Geoffrey Parker, Esq. (<i>Pro Hac Vice</i>) 7658 Slate Ridge Blvd. Reynoldsburg, OH 43068</p> <p><i>Attorney for Plaintiff Sarah C.</i></p>
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1 2 3 4 5 6 7	<p><i>Attorneys for Defendant Hilton Franchise Holding LLC</i></p> <p>O'HAGAN MEYER PLLC</p> <p>By: <u>/s/ Laura Elizabeth Rios</u> Marcus Lee, Esq. Whitney Selert, Esq. Laura Rios, Esq. 300 S. 4th Street, Suite 1250 Las Vegas, NV 89101</p> <p><i>Attorneys for SSJV Hospitality LLC</i></p>	<p>BRANDON SMERBER LAW FIRM</p> <p>By: <u>/s/ Justin W. Smerber</u> 139 East Warm Springs Road Las Vegas, NV 89119</p> <p><i>Attorney for FP Holdings, L.P.</i></p>
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IT IS SO ORDERED. All discovery shall be stayed pending the Court's decision on the Motions to Dismiss. To the extent the Court's decision on the Motions to Dismiss does not fully dispose of this matter, a discovery plan and proposed scheduling order shall be due within thirty (30) days of the Court's decision.

IT IS FURTHER ORDERED that the Court finds that the parties have demonstrated good cause to stay discovery. *See Gibson v. MGM International*, No. 2:23-cv-00140-MMD-DJA, 2023 WL 4455726 (D. Nev. July 11, 2023). The parties' stipulation (ECF No. 51) is thus **GRANTED**.


 DANIEL J. ALBREGTS
 UNITED STATES MAGISTRATE JUDGE

DATED: May 6, 2024

CERTIFICATE OF SERVICE

Pursuant to Federal Rule of Civil Procedure 4(b), I hereby certify that on this 6th day of May, 2024, I caused the document **STIPULATION AND ORDER TO STAY DISCOVERY** to be served through the Court's CM/ECF system to those persons designated by the parties that have appeared in the matter.

/s/ Geoffrey Parker
Geoffrey C. Parker, Esq.